

From: [Strobel, Philip](#)
To: [Navecky, David](#)
Cc: [Hubner, Matt](#)
Subject: Savage Tooele Railroad
Date: Tuesday, January 4, 2022 5:37:36 PM
Attachments: [Company's plan for 12-mile rail bisecting wetlands worries Great Salt Lake advocates.pdf](#)

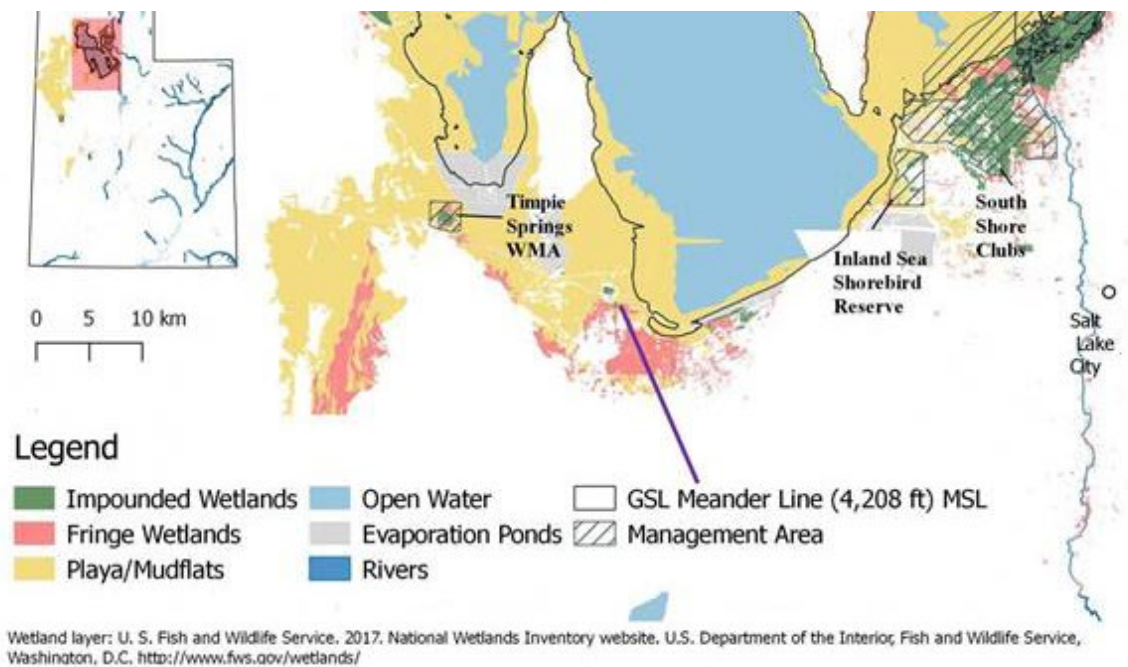
Hello Mr. Navecky:

Matt Hubner of my team forwarded your email to me. I was made aware of the Savage Tooele rail spur primarily through a Salt Lake Tribune Article (attached). That article included a link to the September application by Savage. Although rail spurs of this scale rarely raise significant concerns for EPA, there are several issues I would like for you to be aware of that may be important to your consideration of whether the proposed NEPA Categorical Exclusion would apply, or whether this project may warrant an EA or EIS.

1. Although the application states that the project would not impact any Clean Air Act non-attainment areas (NAA), the project does appear to be wholly within a current PM 2.5 NAA. If I read the STB's categorical exclusion thresholds correctly, any project with more than 3 trains per day in a NAA would require at least an EA. Please understand I am not an expert on your policy, and I understand I could be misreading it.
2. The project also appears to pass through a significant wetlands complex on the south shore of Great Salt Lake (GSL) (see map attached below). The wetlands associated with Great Salt Lake account for nearly 80% of the wetland acreage in Utah. The GSL is designated as a *Hemispheric Site of Importance* by the Western Hemisphere Shorebird Reserve Network, a designation that is shared by only seven such sites in the lower 48 states. The U.S. Fish and Wildlife Service describes the GSL ecosystem as a critically important and irreplaceable resource due to its location, size, and ecological features. In particular, the open waters, shorelines, and adjacent mix of wetlands and uplands provide a critical migratory bird staging area in an otherwise arid region. The maintenance of the GSL ecosystem, and its component areas and functions, is essential to the continued productivity and biodiversity of migratory birds and other wildlife species dependent upon the GSL ecosystem. Many wetlands along the GSL have already been extensively altered or lost due to development pressures. The wetlands associated with GSL are perhaps the most ecologically important wetlands in our Region. I don't know whether there are T&E species that utilize these wetlands during migration. We also have not spoken to the Corps about this project yet to determine whether it may require an individual Section 404 permit or whether this is within the GSL 100yr floodplain. The map provided by the Utah Geospatial Resource Center appears to show the northern part of the line could be within the GSL floodplain (https://opendata.gis.utah.gov/datasets/d8e7d2483a364d58a6d7eac4a250449e_0/explore?location=41.103351%2C-112.742353%2C-1.00).

Here's a GSL wetlands map – I drew in the approximate location of the Tooele Rail (purple line):

Source: <https://deq.utah.gov/wp-content/uploads/DWQ-2018-015970-full-scaled.jpg>



If you would like to discuss these concerns, or correct me where I have misunderstood something, I would be happy to have a call with you. I hope this information is useful in STB's considerations for this project. Thank you for your attention,

Phil Strobel

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From: Navecky, David <David.Navecky@stb.gov>
Sent: Monday, January 3, 2022 12:32 PM
To: Hubner, Matt <Hubner.Matt@epa.gov>
Subject: FW: Tooele County, UT Satellite Port

Hello, Matt –

An environmental review in this matter has not been initiated by the Surface Transportation Board's (Board) Office of Environmental Analysis at this time.

Savage Tooele Railroad Company (Applicant) initially filed for various approvals from the Board on September 2, 2021 in Docket Nos. FD 36524 and FD 36525. On September 30, 2021, the Board placed these proceedings in abeyance and requested supplemental clarifying information for the Applicant by October 20, 2021. The Applicant filed its response on October 19, 2021 and a correction on November 12, 2021.

The Board is reviewing these materials and has not yet issued a decision on its jurisdictional role in these proceedings, the outcome of which will guide what environmental review might be required. I do not know when this decision will be issued.

Please let me know if you have any additional questions.

Thanks,

Dave

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"The river knows everything; one can learn everything from it." — (Herman Hesse, *Siddhartha*)